



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

December 6, 2010

Rick Brazell, Forest Supervisor
Nez Perce National Forest
104 Airport Road
Grangeville, Idaho 83530

Re: U.S. Environmental Protection Agency (EPA) comments for the Nez Perce National Forest (Forest) Designated Routes and Areas for Motor Vehicle Use (DRAMVU) Project Draft Environmental Impact Statement (DEIS). (EPA Project Number: 07-022-AFS)

Dear Mr. Brazell:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement. We have assigned a Lack of Objections (LO) rating to the SDEIS. A copy of the EPA rating system is enclosed.

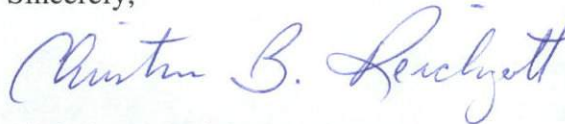
We agree that the proposals within the SDEIS would reduce the impacts of the DEIS's action alternatives. First, restricting parking to one vehicle length off designated roads - as opposed to 300 feet in the DEIS - clearly reduces the potential impacts from parking. Second, clarifying "Conditions of Use - Wheeled Motorized Access for Dispersed Camping" beyond the DEIS's more general limiting factors, "(e.g., cliffs, streams, etc.)", should reduce potential impacts from motorized access to dispersed camping. Third, new designations for 548 miles of roads and 66 miles of trails - primarily seasonal restrictions to protect big game winter and summer habitat - will reduce numerous potential impacts in comparison to the DEIS. The SDEIS's three proposals, then, should reduce overall impacts. We also believe and support the conclusion that the proposals would contribute towards meeting fish and water quality standards - consistent with Nez Perce Forest Plan Standard #21.

EPA believes that travel management on National Forests is an iterative process. We see this SDEIS as one additional step within an ongoing effort to achieve a sustainable system of roads and trails. All action alternatives would still designate approximately 2,000 miles of motorized roads and trails as open either seasonally or yearlong. There is and will continue to be a need for travel management revisions. With this in mind, we reiterate our DEIS concern that monitoring and mitigation measures are not clearly integrated (See page 3 of EPA's February 23, 2009 DEIS comments). In particular, we recommend that the FEIS include additional information on the Motor Vehicle Use Map Revision process. The FEIS should include more information (such as key decision thresholds and levels of required NEPA analysis) on how designations would be changed and maps would be updated annually or as needed. Describe, as applicable, the relevance of Forest Service Handbook (FSH) 7709.55 Section 21.6 and/or Sub-

Part A of the Final Travel Management Rule. FSH 7709.55 Section 21.6 provides direction on a process which can be used to develop, for example, "...a prioritized list of actions or projects that would implement the minimum road system;..."¹ For EPA, implementing the minimum road system is the achievement of a sustainable system of roads and trails.

Thank you for this opportunity to comment and if you have any questions or concerns please contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterston.erik@epa.gov. You may contact me at (206) 553-1601.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure:
EPA Rating System for Draft Environmental Impact Statements

¹ http://www.fs.fed.us/im/directives/fsh/7709.55/7709.55_20.doc

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.